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May 24, 2022

VIA ELECTRONIC CASE FILING

Hon. John P. Cronan, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

The request is granted, and the Initial Pretrial Conference on May 26, 2022 is adjourned *sine die*. The Court will enter the Case Management Plan.

SO ORDERED.
Date: May 25, 2022
New York, New York



JOHN P. CRONAN
United States District Judge

Re: **Trs. of N.Y.C. Dist. Council of Carpenters Pension Fund, et al. v. Statewide Restorations Of New York Inc., et al.; Case No. 22 CV 1457(JPC)**

Dear Judge Cronan:

This firm represents Plaintiffs in the above-referenced case. Plaintiffs write jointly with Defendants to respectfully request that the Court adjourn the initial conference scheduled for Thursday May 24, 2022 or, alternatively, enter the proposed case management plan without the need for an initial conference, as the parties are in agreement on the case management plan and have no other issues requiring the Court's attention at this time.

On May 19, 2022, the parties submitted their joint proposed case management plan and a joint letter articulating the nature of the case and describing the claims and defenses therein. (ECF Doc. No. 20, 21). Since then, the parties have agreed to proceed on a "dual track," whereby the parties will pursue settlement of Plaintiffs' audits of Defendants while simultaneously pursuing discovery in accordance with the proposed case management plan, should the Court adopt it.

Plaintiffs request this adjournment because undersigned counsel and my wife are scheduled to close on the purchase of our first home at the exact same time as the currently scheduled initial conference. Moreover, the parties agree that they can proceed in accordance with the proposed case management plan and on the above-described dual-track approach to this litigation.

Accordingly, the parties respectfully request that the Court adjourn the initial conference to a date convenient for the Court or, alternatively, enter the proposed case management order without the need for an initial conference. This request is the first such request. All parties consent to this request.

The parties thank the Court for its time and attention to this matter.

Respectfully submitted,

John M. Harras
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cc: Counsel of Record (via ECF)